

## R E M A R K S

Claims 1-6 and 10-20 are pending. Claims 1, 10, 14, and 20 are amended. Re-examination and reconsideration are requested.

5 In the office action, dated October 11, 2005, the examiner rejected claims 1, 2, 4-6, 10, 11, 13-17, 19, and 20 under 35 U.S.C. §103(a) as being unpatentable over Twigg, U.S. Patent No. 5,227,954 (Twigg). The examiner rejected claims 3, 12, and 18 under 35 U.S.C. §103(a) as being unpatentable over Twigg in view of Pitz *et al.*, U.S. Patent No. 6,240,058 (Pitz).

### Re the Claims:

10 Claims 1, 10, and 20 are amended to clarify that the first, second, and third cartridge receiving devices are secured directly to respective first, second, and third sets of mounting locations provided on the lower and upper plates.

15 Claim 14 is amended to clarify that the first, second, and third cartridge receiving means are secured directly to respective first, second, and third sets of mounting locations provided on the lower and upper plates.

### Re the Section 103 Rejections based on Twigg:

20 Claims 1, 2, 4-6, 10, 11, 13-17, 19, and 20 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Twigg. These rejections are improper in that Twigg fails to provide the suggestion or incentive required to modify his arrangement to arrive at a structure wherein the drive is directly secured to  
25 the upper and lower plates instead of the drive dock. Consequently, Twigg cannot support a prima-facie case of obviousness of the rejected claims.

In a previous office action, dated August 15, 2005, the examiner stated her rationale for the rejections as follows:  
30 "[I]t is clear that a device may be mounted to a location, without being secured to said location." See p. 3 of the office action of August 15, 2005. The examiner then went on to state that "[a]lthough the device of Twigg is arguably not secured to

the 'left mounting plate 22L and right mounting plate 22R' . .  
. the device of Twigg is nonetheless mounted to the mounting  
plates." (Emphasis added).

5 The claims are amended to address the examiner's rationale  
and to distinguish the claims over Twigg. For example, claim 1  
is amended to clarify that the devices are secured (i.e., not  
mounted) to the upper and lower plates. This amendment clearly  
distinguishes claim 1 over Twigg, as admitted by the examiner.  
That is, in Twigg, the disk drive (20) is secured to the drive  
10 dock (21) (e.g., via brackets 23R and 23L), and not to the plates  
(22R and 22L).

The reason Twigg secures the disk drive to the drive dock  
and not to the plates is because Twigg desires the drive to be  
removable from the drive dock, but without the need to first  
15 remove the drive dock from the computer. If Twigg secured the  
disk drive to the plates instead of the drive dock, this purpose  
would be defeated. That is, the drive dock would have to be  
removed from the computer before the drive could be removed from  
the plates.

20 Because modifying the Twigg arrangement to secure the disk  
drive directly to the plates rather than to the drive dock would  
defeat a stated objective of the Twigg reference, Twigg cannot  
be said to provide the suggestion or incentive required to modify  
his device in a manner that would meet the limitations of amended  
25 claim 1. Put in other words, in Twigg, there is no need, thus  
no suggestion or incentive, to modify his mounting arrangement  
in a manner that would defeat a stated objective of his  
invention. Consequently, Twigg cannot be used to support a  
prima-facie case of obviousness. Therefore, claim 1 is allowable  
30 over Twigg.

Claims 2-6, are allowable at least because they depend from  
claim 1, which is allowable over Twigg.

Claim 10 is allowable over Twigg because Twigg fails to  
provide the suggestion or incentive that would motivate a person  
35 having ordinary skill in the art to modify the Twigg arrangement

in the manner required by amended claim 10.

Amended claim 10 requires that the various cartridge receiving devices be directly secured to various respective sets of mounting locations provided on the lower and upper plates. This is not the arrangement described in Twigg. Instead, Twigg secures his disk drive to the drive dock 21, not to the plates 22R and 22L. Moreover, because Twigg specifically desires the disk drive to be removable from the drive dock without the need to remove the drive dock from the computer, Twigg cannot be said to provide the suggestion or incentive to modify his mounting arrangement to arrive at a configuration wherein the disk drive would be secured directly to the plates. Consequently, claim 10 is not obvious in light of Twigg.

Claims 11-13 are allowable at least because they depend from claim 10, which is allowable over Twigg.

Claim 14 is allowable over Twigg in that Twigg does not provide the suggestion or incentive required to motivate a person having ordinary skill in the art to modify the Twigg arrangement in the manner required by amended claim 14.

That is, amended claim 14 requires that the first, second, and third cartridge receiving means be directly secured to respective first, second, and third sets of mounting locations that are provided on the lower and upper plates. Twigg does not disclose or suggest this arrangement. To the contrary, Twigg secures his disk drive to the drive dock 21, not to the plates 22R and 22L. In addition, because Twigg specifically desires the disk drive to be removable from the drive dock without the need to remove the drive dock from the computer, Twigg cannot be said to provide the suggestion or incentive to modify his mounting arrangement to directly secure the disk drive to the plates, as this would require the drive dock to be removed first. Consequently, claim 14 is not obvious over Twigg.

Claims 15-19 are allowable at least because they depend from claim 14, which is allowable over Twigg.

Claim 20 is allowable over Twigg in that Twigg does not

provide the suggestion or incentive required to motivate a person having ordinary skill in the art to modify the Twigg arrangement in the manner required by claim 20.

5 Claim 20 requires at least defining a first component configuration by directly securing first and second cartridge receiving devices to corresponding first and second sets of mounting locations provided on the lower and upper plates. Claim 20 also requires at least defining a second component configuration by directly securing a third cartridge receiving  
10 device to a third set of mounting locations provided on the lower and upper plates. Twigg does not disclose or suggest such a mounting method. Instead, Twigg secures his disk drive to the drive dock 21, not to the plates 22R and 22L. Furthermore, because Twigg specifically desires the disk drive to be removable  
15 from the drive dock without the need to remove the drive dock from the computer, Twigg cannot be said to provide the suggestion or incentive to modify his mounting method to involve directly securing the disk drive to the plates, which would require the drive dock to be removed. Consequently, claim 20 is not obvious  
20 over Twigg.

Re the Section 103 Rejections based on Twigg and Pitz:

The examiner rejected claims 3, 12, and 18 under Section 103(a) as being unpatentable over Twigg in view of Pitz. These rejections are improper in that neither reference, taken alone  
25 or in combination, provides the suggestion or incentive required to motivate a person having ordinary skill in the art, and with no knowledge of the present invention, to modify the structures disclosed in Twigg and Pitz in the manner required by the rejected claims. Consequently, claims 3, 12, and 18 are  
30 allowable over Twigg and Pitz.

As discussed above, Twigg fails to provide the suggestion or incentive required to motivate a person having ordinary skill in the art to modify his mounting arrangement in the manner required by the pending claims because to do so would defeat a

stated objective of the Twigg reference. Pitz provides no suggestion or incentive to that would motivate a person having ordinary skill in the art to modify Twigg in a manner that would defeat this stated objective, either. Thus, even if Twigg and Pitz were to be combined, no combination of Pitz and Twigg would result in a structure that meets the limitations of claims 3, 12, and 18. That is, the resulting structure would still fail to meet the limitations in independent claims 1, 10 and 14 that relate to the direct securing of the cartridge receiving devices (in the case of claims 3 and 12) or the cartridge receiving means (in the case of claim 18) to the lower and upper plates. Consequently, claims 3, 12, and 18 are allowable over Twigg and Pitz.

Applicants believe that all of the claims pending in this patent application are allowable and that all other issues raised by the examiner have been rectified. Therefore, applicants respectfully request the examiner to reconsider the rejections and to grant an early allowance. If any questions or issues remain to be resolved, the examiner is requested to contact the applicants' attorney at the telephone number listed below.

Respectfully submitted,

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Date: 1-10-06